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19 **UNITED STATES DISTRICT COURT**
20 **DISTRICT OF NEVADA**

21 INTERNATIONAL MARKETS LIVE INC.,
22 a New York corporation dba IM MASTERY
23 ACADEMY,

24 Plaintiff,

25 v.

26 DAVID IMONITIE an individual; SPELA
27 SLUGA, an individual; DEVON ROESER,
28 an individual; IVAN TAPIA, an individual;
NVISIONU, INC., a Delaware corporation;
ILYKIT, LLC, a Utah limited liability
company, LUCAS LONGMIRE, an
individual; NATHAN SAMUEL, an
individual; MICHAEL ZHOR, an individual;
IMRAN RICHIE, an individual; JUSTIN
OWENS, an individual; PAULO
CAVALLERI, an individual; JOSE
MIGUEL CONTREAS, an individual; BASS
GRANT, an individual; ANGELA
CRUISHANK, an individual; JEFF
CRUISHANK, an individual; VINCE
MURPHY, an individual; GARY
MCSWEEN, an individual; KATRINA

Case No.: 2:22-CV-01863-GMN-BNW

**STIPULATION AND [PROPOSED]
ORDER RE: EXTENSION OF TIME FOR
FILING OF PAPERS RELATED TO
PLAINTIFF'S MOTIONS TO DISMISS
(ECF NOS. 152 AND 153)**

1 WORGESS, an individual; LUIS
 2 RONALDO HARNANDEZ ARRIAGA, an
 3 individual; STEPHANIA AYO, an
 4 individual; SILVIA AYO, an individual;
 5 CATALINA VASQUEZ, an individual;
 6 MATHIAS VASQUEZ, an individual;
 7 DOES 1 through 10, inclusive; and ROE
 8 CORPORATIONS I through X, inclusive,
 9
 10 Defendants.

11 AND ALL RELATED MATTERS

12 **STIPULATION AND [PROPOSED] ORDER**

13 Defendants/Counterclaimants David Imonitie (“Imonitie”) and Ivan Tapia (“Tapia”),
 14 Counterdefendant Christopher Terry (“Terry”) , (collectively, the “Parties”) by and through their
 15 respective undersigned counsel of record, the law firms of Slighting Law, Wellman and Warren,
 16 LLP, James Dodge Russell & Stephens PC, Kerr Simpson Attorneys at Law and Holland & Hart
 17 LLP, hereby stipulate and agree to: 1) extend the deadline for Imonitie and Tapia to respond to
 18 Plaintiff’s Motions to Dismiss (ECF. Nos. 152 and 153); and 2) extend the deadline for Terry to
 19 reply to the responses filed by Imonitie and Tapia. The parties hereby specifically agree and
 20 stipulate as follows:

21 WHEREAS, on April 18, 2023, Plaintiff filed its Motions to Dismiss the Counterclaims
 22 filed by Tapia and Imonitie (Motions to Dismiss – ECF Nos. 152, 153; Counterclaims – ECF Nos.
 23 44 and 128, respectively).

24 WHEREAS, on April 25, 2023, counsel for the parties met and conferred via email and
 25 agreed to allow Imonitie and Tapia an additional two (2) weeks of time from the current due dates
 26 of May 2, 2023 to file their responses to Plaintiff’s Motions to Dismiss, thereby making such
 27 responses due May 16, 2023.
 28

1 WHEREAS, on April 25, 2023, counsel for the Parties met and conferred via email and
2 agreed to allow Plaintiff an additional two (2) weeks after the filing of Imonitie's and Tapia's
3 responses to the Motions to Dismiss for Plaintiff to file replies, thereby making such replies due
4 May 30, 2023.

5 WHEREAS, no Parties oppose the extension of time for the filing of briefing related to the
6 Motions to Dismiss as set forth herein.

7 THEREFORE, the parties jointly stipulate that the Court should enter an order allowing
8 Imonitie and Tapia to file their responses by May 16, 2023 and for Plaintiff to file its replies to the
9 responses by May 30, 2023.
10

11
12 Respectfully submitted, this 2nd day of May 2023

13 **SLIGHTING LAW**

14
15 /s/Bradley S. Slighting

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20 **WELLMAN AND WARREN LLP**

21 /s/Chris Wellman

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Attorney for Defendant Ivan Tapia

IT IS SO ORDERED.

Dated: May 9, 2023.



Hon. Judge Gloria M. Navarro
United States District Court Judge

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 2nd day of May, 2023, a true and correct copy of the forgoing document **STIPULATION AND [PROPOSED] ORDER RE: EXTENSION OF TIME FOR FILING OF PAPERS RELATED TO PLAINTIFF'S MOTIONS TO DISMISS (ECF NOS. 152 AND 153)** was filed with the Clerk of the Court using the CM/ECF system which automatically sent notification of such filing to and served electronically upon the following counsel who have entered an appearance in this action:

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